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*Attorneys for Defendant
SilverSummit Health Plan, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DIGNITY HEALTH, a California non-profit
public benefit corporation, d/b/a ST. ROSE
DOMINICAN HOSPITAL,

Plaintiff,

vs.

SILVERSUMMIT HEALTH PLAN, INC.;
DOES 1 THROUGH 25; and ROES 1
THROUGH 25,

Defendants.

Case No. 2:25-cv-00576-JAD-EJY

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
SUBMISSION OF DISCOVERY PLAN
AND SCHEDULING ORDER**

(First Request)

Plaintiff Dignity Health d/b/a St. Rose Dominican Hospital (“Dignity Health”), and
defendant SilverSummit Health Plan, Inc. (“SilverSummit”), by their attorneys, request a 30-day
extension of the current deadline of May 12, 2025, for the parties to submit a stipulated discovery
plan and scheduling order in light of the court’s forthcoming hearing on SilverSummit’s fully

1 briefed motion to dismiss. The deadline to submit a stipulated discovery plan and scheduling order
2 has not been extended before, and the parties submit that good cause supports this extension
3 request as required by Local Rule IA 6-1(a).

4 SilverSummit removed this case from the Eighth Judicial District Court, Clark County,
5 Nevada, on March 28, 2025. Dkt. 1. Local Rule 26-1(a) requires the parties to participate in the
6 scheduling conference required by Fed. R. Civ. P. 26(f) within 30 days after the defendant answers
7 or otherwise appears, and then to submit a stipulated discovery plan and scheduling order within
8 14 days after the Rule 26(f) conference. The current deadline for the parties to submit a stipulated
9 discovery plan and scheduling order is therefore May 12, 2025.

10 The parties request a 30-day extension of this current deadline in light of the forthcoming
11 hearing on SilverSummit's fully briefed motion to dismiss, which is scheduled May 27, 2025, at
12 1:30 p.m. Dkt. 18; *see also* Dkt. 4 (SilverSummit's motion to dismiss); Dkt. 14 (Dignity Health's
13 response); Dkt. 17 (SilverSummit's reply). The hearing and any subsequent order issued by the
14 court regarding SilverSummit's motion to dismiss may impact the nature and scope of the claims
15 asserted in Dignity Health's original or any forthcoming amended complaint and, thus, the nature
16 and scope of any discovery in this case. Accordingly, the parties request an extension of 30 days,
17 through and including June 11, 2025, to submit a stipulated discovery plan and scheduling order.

18 Dated: May 6, 2025

STEPHENSON, ACQUISTO & COLMAN

19 By: s/ Scott B. Van Alfen

20 Scott B. Van Alfen

21 *Attorney for Plaintiff Dignity Health*

HUSCH BLACKWELL LLP

By: s/ Abraham J. Souza

Abraham J. Souza

Admitted Pro Hac Vice

*Attorney for Defendant SilverSummit Health
Plan, Inc.*

IT IS SO ORDERED.

Dated this 6th day of May, 2025.


UNITED STATES MAGISTRATE JUDGE